

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X **NOTICE OF REMOVAL**

MATTHEW TORRES,

Plaintiff,

DOCKET NO.: 1:07-cv-09323-RJH

-against-

ST. PETER'S COLLEGE and  
ALLIEDBARTON SECURITY SERVICES,  
INC.,

Defendant.

-----X

TO THE CLERK OF THE ABOVE-ENTITLED COURT:

Defendant ALLIEDBARTON SECURITY SERVICES, LLC I/S/H ALLIEDBARTON SECURITY SERVICES, INC. hereby files this Notice of Removal of the above-described action to the United States District Court for the Southern District of New York from the New York State Supreme Court, New York County, where the action is now pending as provided by Title 28, U.S. Code, Chapter 89 and states:

1. ALLIEDBARTON SECURITY SERVICES, LLC I/S/H ALLIEDBARTON SECURITY SERVICES, INC. is the defendant in the above entitled action.
2. The above entitled action was commenced in the Supreme Court, New York County, State of New York and is now pending in that court. A copy of the plaintiff's complaint setting forth the claim for relief upon which the action is based was first received by the Defendant on October 4, 2007.
3. The action is a civil action for a personal injuries as a result of an alleged assault and the United States District Court for the Southern District of New York has jurisdiction by reason of the diversity of citizenship of the parties.
4. Plaintiff is now and at the time the state action was commenced a citizen of the State of New York and Defendant ALLIEDBARTON SECURITY SERVICES, LLC I/S/H ALLIEDBARTON SECURITY SERVICES, INC. is now and at the time the state action was commenced a citizen of the State of Delaware and defendant ST. PETER'S COLLEGE is a resident of New Jersey. The matter in controversy exceeds, exclusive of costs and disbursements, the sum or value of \$150,000. No change of citizenship of parties has occurred since the commencement of the action. Defendant is not a citizen of the state in which the action was brought.
5. A copy of all process, pleadings, and orders served upon Defendant is filed with this notice.
6. Defendant will give written notice of the filing of this notice as required by 28 U.S.C.A. § 1446(d).
7. A copy of this notice will be filed with the clerk of the Supreme Court, New York County, as required by 28 U.S.C. § 1446(d).

Dated: New York, NY  
October 17, 2007

**SHAHER GLAZER, LLP**

Attorneys for ALLIEDBARTON SECURITY SERVICES, LLC  
I/S/H ALLIEDBARTON SECURITY SERVICES, INC.

By: s/  
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2641 Kennedy Boulevard  
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Beal & Beal, Esqs.  
Mr. Kenneth I. Beal  
34 Birchwood Park Crescent  
Jericho, NY 11753

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Notice of Removal and Rule 7.1 Statement were mailed by first class mail, postage prepaid this October \_\_\_\_, 2007, to all counsel of record as indicated on the service list below.

s/

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HOWARD S. SHAFER (HS5101)  
For the Firm

**SERVICE LIST**

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